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*Lead Counsel for Court Appointed Lead  
Plaintiff Arman Anvari and the Class*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE TEZOS SECURITIES LITIGATION

Master File No. 17-cv-06779-RS

**CLASS ACTION**

This document relates to:

ALL ACTIONS.

**STIPULATION AND [PROPOSED]  
ORDER PURSUANT TO MARCH 16,  
2018 ORDER (DKT. NO. 101)**

1 WHEREAS, on February 6, 2018, the Court continued the case management conference  
2 to April 26, 2018 at 10:00 AM in Courtroom 3, 17<sup>th</sup> Floor, San Francisco (Dkt. No. 72);

3 WHEREAS, on March 16, 2018, the Court issued an order (“March 16 Order”) (Dkt. No.  
4 101) appointing Arman Anvari as Lead Plaintiff, and appointing LTL Attorneys LLP and Hung  
5 G. Ta, Esq. PLLC as co-lead counsel;

6 WHEREAS, in the March 16 Order, the Court consolidated the following cases: (1)  
7 *GGCC, LLC, v. Dynamic Ledger Solutions, Inc., et al.*, Case No. 17-cv-6779; (2) *Okusko v.*  
8 *Dynamic Ledger Solutions, Inc., et al.*, Case No. 17-cv-6829; and (3) *MacDonald v. Dynamic*  
9 *Ledger Solutions, Inc., et al.*, Case No. 17-cv-7095;

10 WHEREAS, in the March 16, Order, the Court directed the parties to meet and confer  
11 within ten days of the entry of the order, and file a stipulation and proposed order setting forth a  
12 proposed schedule for filing of a consolidated complaint and a briefing schedule for Defendants’  
13 anticipated motions in response to the consolidated complaint;

14 IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of  
15 all parties, as follows:

16 (a) Lead Plaintiff shall file the consolidated complaint on or before April 3, 2018;

17 (b) Defendants shall file their motions to dismiss the consolidated complaint on or  
18 before May 15, 2018;

19 (c) Lead Plaintiff shall file his opposition to Defendants’ motions to dismiss on or  
20 before June 8, 2018;

21 (d) Defendants shall file any replies in further support of their motions to dismiss on  
22 or before June 29, 2018; and

23 (e) the case management conference currently scheduled for April 26, 2018 shall be  
24 continued to a date after the Court rules on Defendants’ motions to dismiss.

25 (f) Nothing in this stipulation constitutes either a waiver of any defense by any  
26 Defendant, including as to this Court’s personal jurisdiction and venue, or a general appearance  
27 by any Defendant.  
28

1 Stipulated and agreed to by:

2 Date: March 23, 2018

3 LTL ATTORNEYS LLP

DAVIS POLK & WARDWELL LLP

4 By: /s/ Enoch H. Liang

By: /s/ Neal A. Potischman

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**FILER'S ATTESTATION**

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: March 23, 2018

/s/ Enoch H. Liang

Enoch H. Liang

\* \* \*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2  
3 Date: \_\_\_\_\_

4 \_\_\_\_\_  
5 HONORABLE RICHARD SEEBORG  
6 U.S. DISTRICT JUDGE  
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